

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SHAUNCY CLAUD,

Plaintiff,

Index No.: 2:18-cv-01390-DRH-AKT

-against-

BROWN HARRIS STEVENS OF
THE HAMPTONS, LLC,

DECLARATION OF G. OLIVER
KOPPELL IN OPPOSITION TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT

Defendant.

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G. Oliver Koppell declares as follows:

- 1) I am the principal of the Law Offices of G. Oliver Koppell & Associates, counsel for the Plaintiff in the above captioned matter. I am admitted to practice law in the Courts of the State of New York and the United States District Court for the Eastern District of New York.
- 2) I submit this declaration in opposition to defendant Brown Harris Stevens of the Hamptons, LLC's motion for summary judgment.
- 3) Attached hereto as Exhibit 1 is a true and correct copy of the deposition transcript of the plaintiff, Shauncy Claud, dated January 15, 2019.
- 4) Attached hereto as Exhibit 2 is a true and correct copy of the deposition transcript of Aspasia G. Comnas, dated February 12, 2019.
- 5) Attached hereto as Exhibit 3 is a true and correct copy of an email from Shauncy Claud to Robert Nelson, dated June 22, 2017.
- 6) Attached hereto as Exhibit 4 is a true and correct copy of an email chain between Aspasia Comnas and Robert Nelson, dated June 29, 2017.

7) Attached hereto as Exhibit 5 is a true and correct copy of an Exclusive Right to Sell Agreement, dated April 17, 2017 between Cassandra Ham-Brown and Defendant.

8) Attached hereto as Exhibit 6 is a true and correct copy of an Exclusive Right to Sell Agreement, dated July 12, 2017 between Cassandra Ham-Brown and Nest Seekers International.

9) Attached hereto as Exhibit 7 is a true and correct copy of a letter signed by Cassandra Brown, dated July 12, 2017.

10) Attached hereto as Exhibit 8 is a true and correct copy of an email from Aspasia Comnas to Jennifer Wisner and Robert Nelson, dated June 30, 2017.

11) Attached hereto as Exhibit 9 is a true and correct copy of emails sent by Aspasia Comnas, dated June 30, 2017.

12) Attached hereto as Exhibit 10 is a true and correct copy of the Affidavit of Reginald Morris, dated May 30, 2019.

13) Attached hereto as Exhibit 11 is a true and correct copy of Defendant's Response to Plaintiff's Set of Interrogatories, dated September 21, 2018.

14) Attached hereto as Exhibit 11 is a true and correct copy of Plaintiff's Second Amended Initial Disclosures Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, dated November 27, 2018.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: August 30, 2019.

_____/s/_____
G. Oliver Koppell